REMARKS

Rejection under 35 U.S.C. 103

Claims 1-9 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,298,356 to Jawahar in view of U.S. Patent No. 6,915,336 to Hankejh. Applicants respectfully disagree.

Claim 1

In response to the previous action, mailed on July 13, 2005, Applicants had explained in detail that there is nothing in Jawahar that can be understood as teaching the analysis of data that is <u>input</u> by the <u>user</u> into any of the web page, and had respectfully invited the Examiner to cite precisely where Jawahar discloses this limitation.

In the present Action, the Examiner opines that the "help" button of Jawahar makes an active node an interactive node. Since an interactive note involves inputing data, and since the Examiner fails to give any other indication as to where Jawahar shows data input by the user, Applicants assume that the Examiner opines that by selecting the "help" button, the user inputs data in the system of Jawahar.

Applicants however note that, even assuming, *arguendo*, that the help request sent when the "help" button is clicked corresponds to data input by the user, Jawahar does <u>not</u> disclose or suggest <u>analyzing</u> the request to <u>determine with which web page it is associated</u>. The help request of Jawahar contains no information that relates it to what web page was accessed by the user when the "help" button was selected, and Jawahar provides (col. 17, lines 47-48) for determining what web page was accessed by the user when the "help" button was selected (including page accesses performed using the "back" and "forward" functions) with a monitoring application installed in the browser of the user's computer (col. 14, lines 40-43): Jawahar therefore teaches determining, <u>without analyzing the request</u>, what web page was accessed by the user when the "help" button was selected.

Accordingly, even assuming that the help request sent when the "help" button is selected would read on data input by the user, Jawahar would still fail to teach a

"*processor being arranged to analyse the user input data to determine the interactive node in the sequence of activity nodes to which the user input data is associated*" as recited in claim 1.

Applicants further note that, by teaching to determine, without analyzing the request, the web page accessed when a request is placed, Jawahar actually teaches away from a processor "*arranged to analyse the user input data to determine the interactive node in the sequence of activity nodes to which the user input data is associated*", as recited in claim 1.

Besides, Applicants note that the help request of Jawahar is used for putting an agent in communication with the user requesting help, but is not used for the execution of the web page or of an activity node including the web page. Accordingly, even assuming that the help request sent when the "help" button is selected would read on data input by the user, Jawahar would still fail to disclose any "interactive node" as recited in claim 1, and in particular "*arranged to allow a user to input data for use in the execution of an activity node*".

Applicants also note that the Examiner has failed to show that Hankejh discloses or suggests in any way a processor "*arranged to analyse the user input data to determine the interactive node in the sequence of activity nodes to which the user input data is associated*", as recited in claim 1, and that accordingly, the Examiner has failed to show that any combination of Jawahar and Hankejh would have led one skilled in the art to an apparatus as recited in claim 1, and in particular comprising a processor "*arranged to analyse the user input data to determine the interactive node in the sequence of activity nodes to which the user input data is associated*". At least in view of the above, the Applicants respectfully submit that claim 1 is patentable over Jawahar in view of Hankejh.

Further, the Applicants note that Hankejh relates to a system that makes businesses "able to immediately 'answer' the questions of those who are browsing their site without the assistance of a plug-in, 1-800 service, an additional application, added hardware, or a high-speed connection" (col. 3, lines 62-65). Applicants note that the alleged purpose of Hankejh, such as making businesses able to immediately answer the questions of those who are browsing their site without the assistance of an additional application, relates to suppressing the need for an application such as described in

Jawahar. Applicants submit that one skilled in the art would not have been motivated to combine the system of Jawahar with the teachings of a document that expressly teaches away from a system such as Jawahar's. For this reason, the Applicants respectfully submit that Jawahar and Hankejh are not a proper combination in view of claim 1.

The Applicants note that the Examiner acknowledges that there is "no explicit teaching of a type of sequence as what is well known in the art as workflow" in Jawahar, but opines that Hankejh "teaches workflow in the regards to a type of sequence in which activities are processed", and opines that it would have been obvious to combine the schedule such as described in col. 9, lines 40-67 of Hankejh with the system such as described col.1, lines 10-28, col. 15, line 37 – col. 16, line 6 & col. 16, lines 40-67 of Jawahar, because utilizing a schedule to answer user requests for aid gives the system the ability to not let users that have been waiting for aid to be forgotten by agents if they are not aided in a timely fashion, i.e. first come first served.

Col. 9, lines 40-67 of Hankejh relate to a sequence of operations (user is placed in iSession queue or is introduced into an existing channel; Iserver Web serves the client Java applet HTML document to the user; etc...) executed for placing a user requesting access to a live session in an iSession queue so as to be able either to introduce the user in an iSession or, if no agent is available, to give the user the options of 1) wait; 2) schedule an iSession for a later time; or 3) try again later.

Applicants have shown above that one skilled in the art would have lacked motivation to combine Jawahar and Hankejh. Besides, Applicants note that even assuming, *arguendo*, that one skilled in the art had for some undisclosed reason decided to combine Jawahar with some aspects of Hankejh, such as the sequence of operations of col. 9, lines 40-67, the Examiner has failed to show that this sequence of operations reads in any way on a sequence of activity nodes that include a plurality of interactive nodes, and in particular on a *"sequence in which activity nodes that include a plurality of interactive nodes must be performed"* as recited in claim 1.

In view of the above, Applicants submit that the Examiner has failed to show that any combination of Jawahar and Hankejh would have led one skilled in the art to an apparatus as recited in claim 1, and in particular *"for implementing a workflow defined*

by a _sequence_ in which _activity nodes_ that _include_ a _plurality of interactive nodes_ must be _performed_". For this reason also, Applicants respectfully submit that claim 1 is patentable over Jawahar in view of Hankejh.

Claim 7

Applicants respectfully submit that the above arguments can be used to show that the Examiner has failed to show that any combination of Jawahar and Hankejh would have led one skilled in the art to an apparatus as recited in claim 1, and in particular provided for _"for implementing a workflow defined by a sequence in which activity nodes that include a plurality of interactive nodes must be performed"_ and having a processor _"arranged to analyse the user input data to determine the interactive node in the sequence of activity nodes to which the user input data is associated"_. Accordingly, Applicants respectfully submit that claim 7 is patentable over Jawahar in view of Hankejh.

Claims 2-6 and 8-9

Claims 2-6 depend directly or indirectly on claim 1 and claims 8-9 depend directly or indirectly on claim 7. Applicants submit that claims 2-6 and 8-9 are patentable at least in view of their dependency on claims 1 or 7.

In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

The Commissioner is authorized to charge any additional fees that may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

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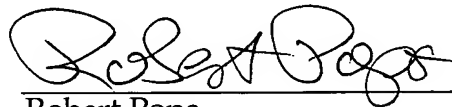(Name of Person Transmitting)

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